



June 21, 2012

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Ms. Karen Majcher
Vice President, High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, D.C. 20036

Re: WC Docket No. 10-90, Annual §54.313 Report of High-Cost Recipient

Dear Mss. Dortch and Majcher:

Enclosed please find the Annual Reporting Requirements of Mark Twain Communications Company, Study Area Code 429001, (serving in Incumbent 421151), pursuant to 47 C.F.R. §54.313(a)(2)-(6). In addition, please find a copy of the Annual Certification documents filed with the Missouri Public Service Commission, pursuant to 4 CSR 240-3.570.

Please direct any questions regarding this filing to Jim Lyon at

Phone: 660-423-6822
Email: jlyon@marktwain.net

Respectfully Submitted,

William Rohde
Executive Vice President & General Manager
Mark Twain Communications Company

Enclosure

Subsidiary of Mark Twain Rural Telephone Co.

P.O. Box 128, Hwy 6 E. Hurdland, MO 63547-0128 Phone: (660) 423-6822 Fax: (660) 423-5496

Annual Reporting Requirements pursuant to § 54.313(a)(2)-(6)

WC Docket No. 10-90

§ 54.313(a)(2) – Outage reporting

 X My company was not required to collect this information in 2011.

 My company collected this information pursuant to state utility commission requirement.
A copy of the report is attached.

§ 54.313(a)(3) – Unfulfilled service requests

 My company was not required to collect this information in 2011.

 X My company collected this information pursuant to state utility commission requirement.
A copy of the report is attached.

§ 54.313(a)(4) – Customer complaints per 1000 connections

 X My company was not required to collect this information in 2011.

 My company collected this information pursuant to state utility commission requirement.
A copy of the report is attached.

§ 54.313(a)(5) – Service quality standards and consumer protection rules

I certify that the reporting carrier is in compliance with applicable service quality standards and consumer protection rules.

§ 54.313(a)(6) – Ability to function in emergency situations

I certify that the reporting carrier can function in emergency situations as set forth in 47 CFR §54.202(a)(2). Specifically, the reporting carrier has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

I am authorized to make this certification on behalf of the company named above and, to the best of my knowledge the information reported on this form is accurate. This certification is for the study area(s) listed below. **(Please enter your Company Name, State and Study Area Code)**

Company Name	State	Study Area Code
Mark Twain Communications Company	Missouri	429001

(If necessary, attach a separate list of additional study areas and check this box.)

☐

Signed,



Date:

June 18, 2012

[Signature of Corporate Officer]

William Rohde

[Printed Name of Corporate Officer]

Executive V.P. & G.M.

[Title of Corporate Officer]

Carrier's Name Mark Twain Communications Company

Carrier's Address P.O. Box 128, Hurdland, MO 63547

Carrier's Telephone Number (660) 423-6822



**MARK TWAIN
COMMUNICATIONS CO.**

June 18, 2012

Mr. John Van Eschen
Manager, Telecommunications Department
Missouri Public Service Commission
Governor Office Building
200 Madison Street, P.O. Box 360
Jefferson City, MO 65102

Re: Mark Twain Communications Company USF Certification Filing

Dear Mr. Van Eschen:

The Public Service Commission of the State of Missouri ordered all Eligible Telecommunications Carriers receiving Federal Universal Service Funds (USF) to file an affidavit and certain supporting documentation as to the actual use of the funds. Attached to this memorandum please find the required affidavit, spreadsheet and copies of the information filed with the Universal Service Administrative Company to receive federal support during the past year. Mark Twain Communications Company (MTCC) is a competitive eligible telecommunications carrier (CETC) and receives federal USF. As such, MTCC must certify its use of the federal USF with the Commission.

MTCC serves the Northeast part of the State, in Lewis County with 780 access lines in competition with the incumbent local exchange carrier Spectra Communications Group, LLC dba CenturyLink.

Mark Twain Communications Company is a facility based CLEC providing service to three rural exchanges (La Belle, Lewistown and Ewing). MTCC maintains substantial investment in distribution and switching plant, to provide the supported services required by the Federal Communications Commission. Further, MTCC has made investments necessary to respond to customer requests for service at new locations, to replace plant as needed to maintain quality service, and to enhance switching capabilities to meet regulatory requirements and customers' demands for service. In the past year, the Company has invested over \$64,000 on plant additions to connect new subscribers. The Company also incurred substantial operating expenses, over \$465,000 in the maintenance of these facilities to provide service at appropriate levels and to respond to requests for repair of these facilities as necessary. These costs and investment amounts were necessary to continue to provide customers in these three rural exchanges with access to telecommunications and information services reasonably comparable to those provided in urban areas. MTCC believes that these amounts were reasonable, and not greater than necessary.

The amount of ICLS and HCL funds received during 2011 averaged only \$3,584 per month with the amount fluctuating monthly. Such support was used in addition to any expenses MTCC would normally incur. The amount of FHCS received to date for 2012 is averaging \$5,215 per month. Future projections of ICLS have not been performed as potential revenues in the La Belle, Lewistown and Ewing exchanges are unpredictable because, the monthly amount we receive from USAC varies widely, and the monthly amount is unknown until received. Attached is a copy of our Annual ICLS Certification filing with the FCC.

MTCC not only provides basic local telecommunication services as defined by Commission Rule 4 CSR 240-32.020(5), but it also makes available high speed and dial-up Internet service to 100 percent of our customers. Our current high speed take rate is 59 percent. Accordingly, MTCC provides state-of-the-art telecommunications services to its customers in La Belle, Lewistown and Ewing, Missouri, which are comparable to services available in urban areas of the state.

S u b s i d i a r y o f M a r k T w a i n R u r a l T e l e p h o n e C o .

P.O. Box 128, Hwy 6 E. Hurdland, MO 63547-0128 Phone: (660) 423-6822 Fax: (660) 423-5496

Mark Twain is unaware of any complaints regarding its service that have been filed with either the Missouri Public Service Commission or the Federal Communications Commission during the previous twelve months.

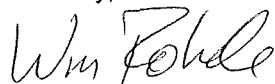
MTCC has had no unfilled service requests for local telephone service in the past twelve months. In some cases, the addition of new customers has been accomplished through the construction of a simple "drop" from the curb to the house. In other cases, it has involved construction in order to reach the new subscriber.

MTCC has a tariffed rate of \$11.25 per residential subscriber and \$18.75 per business subscriber whose service is provided by MTCC using the Company's local loop and switching facilities or by reselling service of another provider, and \$52.60 per residential subscriber and \$60.10 per business subscriber whose service is provided by MTCC using Spectra unbundled loops. MTCC provides unlimited usage as part of its local service offering, as does Spectra, so the MTCC local usage plan is comparable to that of Spectra. In addition, it's a local call when one MTCC subscriber calls another MTCC subscriber in any MTCC exchange, which exceeds the calling scope offered by Spectra. The competing ILEC (Spectra dba CenturyLink) tariffed rate is \$11.50 per residential subscriber and \$19.00 per one-party business line and \$20.88 per Key/PBX line with no expanded calling. Mark Twain estimates that without the current ETC funds, local service rates would have to increase or capital additions may need to be cut back to sustain the same level of maintenance and customer support.

MTCC has made every effort to reach existing and non-existing customers in its outreach program. Existing customers get the benefit of articles in our newsletters and non-existing customers get the benefit of advertising in local papers. We also mailed out information - flyers to the Missouri Department of Social Services agencies in 9 counties. The outreach has attracted 46 low income subscribers and 7 disabled subscribers as of today.

If you have any questions, please call Jim Lyon at 660-423-6822.

Sincerely,



William Rohde
Executive Vice President & General Manager

Attachments

cc: Craig Johnson
Office of Public Counsel
File: USF Certification Filing 2012 MTCC

STATE OF MISSOURI)
)
COUNTY OF KNOX)

AFFIDAVIT OF WILLIAM ROHDE

Before me, the Undersigned Authority, appeared William Rohde, who deposed and stated:

1. My name is William Rohde. I am employed by Mark Twain Communications Company, as its Executive Vice-President and General Manager. I am authorized to give this affidavit on behalf of Mark Twain Communications Company. This affidavit is being given to support the Missouri Public Service Commission's certification as required by 47 CFR 54.314 and MoPSC Rules 4 CSR 240-3.570(4)(A).

2. Mark Twain Communications Company hereby certifies that federal high-cost support is used consistent with the Commission's rules and the Telecommunications Act of 1996.

3. Mark Twain Communications Company continues to be able to function in emergency situations; continues to offer a local usage plan comparable to that offered by Spectra dba CenturyLink, the incumbent local exchange telecommunication carrier serving the La Belle, Lewistown and Ewing exchanges; continues to comply with the applicable service quality standards and consumer protection rules promulgated by the Commission; and continues to acknowledge that it shall provide equal access pursuant to 4 CSR 240-32.100(3) and (4) if the other ETCs in the above exchanges relinquish their designations pursuant to Section 214(e)(3) of the Telecommunications Act of 1996.

4. Mark Twain Communications Company hereby certifies that the supporting information submitted with this Affidavit is true and correct to the best of its knowledge, information and belief.

Further Affiant sayeth naught.



William Rohde
Executive Vice-President and
General Manager
Mark Twain Communications Company

Sworn and subscribed to before me this 18th day of June, 2012.



NOTARY PUBLIC